

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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THE CITY OF NEW YORK,

Plaintiff, Civ. No. 22-5525

-against-

**NOTICE OF MOTION**

ARM OR ALLY, LLC, RAINIER ARMS, LLC, SALVO  
TECHNOLOGIES, INC. d/b/a “80P BUILDER,” ROCK  
SLIDE USA, LLC, and INDIE GUNS, LLC,

Defendants.  
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**PLEASE TAKE NOTICE** that upon the Memorandum of Law in Support of its Motion for a Preliminary Injunction; the Declaration of Sergeant Richard LeBlond, Deputy Sheriff in the Office of the New York City Sheriff; the Declaration of Francesca Rosa, Deputy Sheriff in the Office of the New York City Sheriff; the Declaration of New York City Police Department (“NYPD”) Inspector Courtney Nilan, Commanding Officer of the NYPD’s Field Intelligence Program; and the Declaration of Assistant Corporation Counsel Eric Proshansky, Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, by Eric Proshansky, Assistant Corporation Counsel, will move this Court, at the United States United States Courthouse for the Southern District of New York located at 40 Foley Square, New York, New York, 10007 on a date and at a time to be designated by the Court, for an Order pursuant to Rule 65 of the Federal Rules of Civil Procedure: (1) pending the entry of a final judgment in this case, enjoining the Defendants from selling and delivering into New York City “ghost guns,” “80% receivers or frames,” “unfinished frames or receivers,” unserialized “receivers” or “frames,” or any kits or collections of “unfinished” or unserialized gun parts that can be assembled into a

firearm; and (2) granting the City of New York such other and further relief as the Court deems just and proper.

Dated: New York, New York  
June 29, 2022

**HON. SYLVIA O. HINDS-RADIX**  
Corporation Counsel of the  
City of New York  
*Attorneys for Plaintiff The City of New York*  
100 Church Street, Rm. 20-099  
New York, New York 10007  
(212) 356-2032

By: s/  
Eric Proshansky  
Gail Rubin  
Melanie Ash  
Doris Bernhardt

Assistant Corporation Counsels